

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	:	
	:	
v.	:	
	:	21-CR-10120-WGY
	:	
CESAR ALEJANDRO CASTRO PUJOLS, et al	:	
	:	
Defendants.	:	

**DEFENDANT SONGFENG CHEN'S MOTION TO SEVER**

Defendant Songfeng Chen, by and through undersigned counsel, respectfully moves this Court to enter an Order severing his trial on Count Two of the Indictment (money laundering conspiracy) from the trial of Count One of the Indictment (drug conspiracy), since Mr. Chen is not charged in Count One and would be unable to receive a fair trial if he were tried together with the drug conspiracy. As further grounds, Mr. Chen relies upon the attached Memorandum of Points and Authorities.

Respectfully submitted,

/s/ Stephen G. Huggard  
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February 7, 2022

Rule 7.1 Certificate

I, Stephen G. Huggard, hereby certify that, pursuant to Local Rule 7.1, I have conferred with opposing counsel in an effort to resolve or narrow this issue by email correspondence.

Certificate of Service

I, Stephen G. Huggard, hereby certify that, pursuant to Local Rule 5.2(b)(2), on this 7th day of February 2022, the foregoing document was filed electronically through the ECF system, is available for viewing and downloading from the ECF system, and will be sent electronically to counsel of record as registered participants identified on the Notice of Electronic Filing.

/s/Stephen G. Huggard